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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13
Jesus Cartagena : CASE NO. 18-19793
Debtor : HONORABLE JOHN K. SHERWOOD

ATTORNEY'S RESPONSE TO CREDITOR'S MOTION FOR RELIEF FROM STAY

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtor Luis A. Gutierrez in this bankruptcy proceeding.
2. A Motion for Relief from Stay was entered for the 2015 Jeep Wrangler by First National Bank of Pennsylvania.
3. The motion states that the debtor is in arrears in the amount of \$1,462.05 for the months of March 2017 through May 2017.
4. My legal staff reached out to the debtor to address his arrears and were not able to get a response from him in time to file an opposition.
5. Therefore more time is needed to speak with him regarding this creditor's motion.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: June 17, 2021

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor